# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

KATHLEEN HUNT,	§	
Plaintiff,	§ 8	
Tuning,	§ §	
VS.	§ Case No. 5-	21-CV-00346-JKP
	<b>§</b>	
ASI LLOYDS	<b>§</b>	
	<b>§</b>	
Defendant.	<b>§</b>	

## **JOINT ADR REPORT**

Pursuant to the Court's Scheduling Order<sup>1</sup> and Local Rule CV-88, Plaintiff Kathleen Hunt ("Plaintiff') and defendant ASI Lloyds ("ASI") (collectively, the "Parties"), file this Joint Alternative Dispute Resolution Report, respectfully showing the Courts as follows:

# **INFORMATION REQUIRED BY RULE CV-88(b)**

- 1. **Status of Settlement Negotiations.** As required by the Court's Scheduling Order, Plaintiff submitted a written offer of settlement on September 8, 2021. ASI is required to respond by September 22, 2021 in accordance with the Court's Scheduling Order.
- 2. **Identity of the person responsible for settlement negotiations.** Plaintiff's counsel, Perry J. Dominguez II, and ASI's counsel, Michael I. Ramirez, and David A. DuBois are responsible for settlement negotiations.
- 3. **Whether alternative dispute resolution is appropriate in this case.** The Parties agree ADR is appropriate for this case, and that mediation is the method most likely to result in a

<sup>&</sup>lt;sup>1</sup> Doc. 15.

mutually agreeable resolution of the Parties' dispute. The parties will confer and agree to a mediator in this matter.

4. **Timing for Alternative Dispute Resolution.** The parties anticipate working to schedule mediation after plaintiff's deposition has been completed. Plaintiff's deposition is presently scheduled for September 24, 2021.

Respectfully submitted,

## PERRY DOMINGUEZ LAW FIRM PLLC

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## ATTORNEYS FOR PLAINTIFF

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ATTORNEYS FOR DEFENDANT ASI LLOYDS, INC.

## **CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing instrument has been served electronically via CM/ECF this  $8^{th}$  day of September 2021 to:

Michael I. Ramirez David A. DuBois McCoy Leavitt Laskey LLC 20726 Stone Oak Parkway, Ste. 116 San Antonio, TX 78258

ATTORNEYS FOR DEFENDANT

/s/ Perry Dominguez

Perry J. Dominguez II